

# **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF WEST VIRGINIA**

**Wheeling Division**

DIANA MEY,  
CRAIG CUNNINGHAM,  
STEWART ABRAMSON,  
JAMES SHELTON,  
DAVID and ROXY VANCE,  
RUSSELL LOCKE, and THOMAS STARK,  
individually and on behalf of a class of all  
persons and entities similarly situated,  
Plaintiffs,

Case No.: 5:17-cv-00179-JPB

v.

DIRECTV, LLC,

Defendant.

**DECLARATION OF PAULA PHILLIPS**

I, Paula Phillips, declare, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that, to the best of my knowledge, the following is true and correct:

1. My name is Paula Phillips. I am over the age of 21 and competent to make this declaration, which is based on my own personal knowledge, as well as a review of corporate and business records maintained by AT&T Inc. and its affiliated entities.

2. I am employed by AT&T Services, Inc. as a litigation manager in its legal department. I have held this position since 1991 and have been employed by AT&T Services or one of its affiliates since 1984.

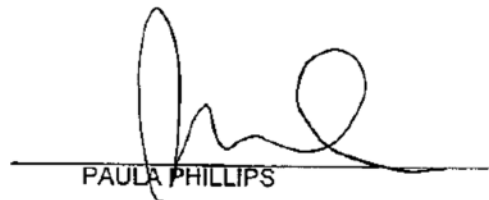
3. As a litigation manager, I am responsible for, among other things, overseeing the response by AT&T Services and its affiliates to various subpoenas and third-party requests for documents. In order to perform this responsibility, I have become personally familiar with the corporate structure of AT&T Services and its affiliates, including DIRECTV, LLC.

4. DIRECTV, LLC, is a California limited liability corporation with its principal place of business in El Segundo, California. West Virginia is not DIRECTV, LLC's principal place of business, and the ultimate decision-making regarding the direction, control and coordination of DIRECTV, LLC's activities does not occur in West Virginia.

5. DIRECTV, LLC's sole member is DIRECTV Holdings LLC. DIRECTV Holdings LLC is a Delaware limited liability company with its principal place of business in California whose sole member is The DIRECTV Group, Inc. The DIRECTV Group, Inc. is a Delaware corporation with its principal place of business in California whose sole shareholder is DIRECTV Group Holdings, LLC. DIRECTV Group Holdings, LLC is a Delaware limited liability company with its principal place of business in California whose sole member is AT&T Inc.

6. DIRECTV, LLC's ultimate parent corporation is AT&T Inc., a publicly held Delaware corporation with its principal place of business in Dallas, Texas. DIRECTV, LLC is a legally and factually separate entity from any other AT&T corporation.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of October, 2020



PAULA PHILLIPS